

**TECHNICAL REVIEW AND EVALUATION OF  
APPLICATION FOR AIR QUALITY CONTROL PERMIT  
FOR EXISTING SOURCE**

PERMITTEE: El Paso Natural Gas Co. DATE: August 6, 1997

ADDRESS: P.O. Box 1492 PERMIT NO.: 1000169

El Paso, TX 79978 NEW SOURCE: N

EQUIPMENT LOCATION: Exit 23, Gem Acres from I-40, approx 19 miles RENEWAL: Y

Kingman, Mohave County, AZ 85401 TITLE V SOURCE: Y

PERMIT CLASS: I PORTABLE: N

PERMIT ENGINEER: Sandy Farace

APPLICABLE REGULATION	CONDITION	MEETS CONDITION			SEE RMK NO.	RVWD BY
		YES	NO	N/A		
R18-2-326	A. <u>ADMINISTRATION</u>			X	1	SF1
	1. Have all applicable fees been paid?					
Appendix 1 R18-2-304.E	2. Has a complete application been submitted? (attach completeness checklist)	X				SF1
R18-2-304.G	3. Has additional information necessary to address any requirements which became effective after the application was filed been submitted? (if applicable)			X		SF1
R18-2-307.A	4. Has a copy of the complete application been submitted to the EPA for review (only required if the application is for a Class I permit)?	X				SF1
R18-2-305	6. Confidentiality			X		SF1
	a. If portions of the application were submitted with a notice of confidentiality, has the applicant been notified as to the Director's confidentiality determination?					
	b. If portions of the application have been determined by the Director to be confidential, has a notice of confidentiality been included in the file?			X		SF1
R18-2-101.60 and 61	7. Is the source classified as a major source as per R18-2-101.61 or a major modification as per R18-2-101.60?	X				SF1
R18-2-306.8.e	8. Has all information and records requested by the Director or the Hearing Board been submitted?	X				SF1
R18-2-310, 309, and 327	9. Have all emission inventory questionnaires, excess emission reports, and compliance certifications been submitted?	X				SF1
ARS § 49-402	10. Does the Arizona Department of Environmental Quality have jurisdiction over this source?	X			2	SF1
Articles 7, 9 and 11	B. <u>AIR POLLUTION CONTROL EQUIPMENT</u>	X				
	1. Have the parameters of all process equipment which may cause or contribute to air pollution been identified?					SF1

APPLICABLE REGULATION	CONDITION	MEETS CONDITION			SEE RMK NO.	RVWD BY
		YES	NO	N/A		
	2. Have all air releases containing regulated air pollutants (including any hazardous air pollutants) been identified and characterized as to strength, concentration, and type of pollutant?	X				SF1
Articles 7, 9 and 11	3. Has the applicant demonstrated that each emission unit is so designed, controlled, or equipped with such air pollution control equipment that it may be <u>expected</u> to operate without emitting or causing to be emitted air contaminants in violation of A.A.C. Title 18, Chapter 2, Articles 7, 9, and 11? (Attach calculations.)			X	3	SF1
Article 6	4. Has the applicant demonstrated that each non-point emission unit is so designed, controlled or equipped with such air pollution control equipment that it may expect to comply with requirements of Article 6 emissions from existing and new non-point sources?	X			4	SF1
A.R.S. §49-427.C	5. Has the source been constructed according to the prior permit? (if not, the source must first obtain a permit revision before receiving a permit renewal)	X			5	SF1
Articles 7, 9 and 11	6. Has the source demonstrated that proposed positive control techniques can be maintained at full operational capacity? (Attach calculations.)	X			3	SF1
Articles 6, 7 & 9	<b>C. REGULATORY SUMMARY</b>					
	1. Has the applicant supplied sufficient material to demonstrate that emission standards can be met for the following:					
	a. Visible emissions	X				SF1
	b. Particulate emissions	X				SF1
	c. Sulfur dioxide emissions	X				SF1
	d. Total sulfur emissions			X		SF1
	e. Volatile organic compounds	X				SF1
	f. NO <sub>x</sub> emissions	X				SF1
	g. Other pollutants _____	X				SF1
Article 11	2. Has the applicant demonstrated the emissions from the facility are such that they will meet hazardous air pollutant standards?			X		SF1
R18-2-312	3. Have any performance tests required by the prior permit been conducted?	X			6	SF1
R18-2-312	4. Has a visible emission test been performed? (if applicable)			X		SF1
R18-2-306	5. Does the permit contain all requirements which became applicable to the source after the prior permit was issued?	X				SF1

APPLICABLE REGULATION	CONDITION	MEETS CONDITION			SEE RMK NO.	RVWD BY
		YES	NO	N/A		
R18-2-309.2	6. Does the permit contain a requirement for the submittal of compliance certifications (at least annually)?	X				SF1
R18-2-309.5	7. Does the permit contain a compliance plan which outlines the procedures used to comply with all requirements and specifies the means for demonstrating compliance?	X				SF1
R18-2-309	8. Does the permit contain a compliance schedule to be used to achieve compliance with those items with which the source does not currently comply.			X	7	SF1
R18-2-306.3, 4	9. Does the permit contain sufficient monitoring, reporting and recordkeeping requirements to determine whether or not the source is in compliance at any time?	X				SF1

**PERMITTEE: EPNG - Dutch Flat Compressor Station**

**DATE: 05/02/94**

**TECHNICAL REVIEW AND EVALUATION  
OF APPLICATION FOR  
AIR QUALITY PERMIT NO. 1000169**

**REMARKS**

REMARK NUMBER	REMARKS	REVIEWED BY
1.	This application is submitted for renewal of existing installation permit #65039 for El Paso's Dutch Flat Compressor Station.	SF1
2.	The facility is located near Kingman, Mohave County. ADEQ has jurisdiction over this source.	SF1
3.	El Paso operates two turbines for natural gas transmission and one of the 2 auxiliary generators for electric power generation. One of the auxiliary generators is insignificant because it is only used for emergency or standby service. No control equipments are used to control emissions from burning natural gas.	SF1
4.	El Paso will control emissions of non-point sources by maintaining gravel, adding fresh vegetation and using dust suppressants and wetting agents.	SF1

<b>REMARK NUMBER</b>	<b>REMARKS</b>	<b>REVIEWED BY</b>
5.	The Solar turbines were installed in 1991 and 1993.	SF1
6.	EPNG-Dutch Flat has to date no records of any violations.	SF1
	<b>ADDITIONAL REMARKS</b>	
7.	Compliance status: According to Field Activity Report (FAR) #14888 dated March 4, 1996, El Paso's Dutch Flat Compressor Station is in compliance.	SF1

REMARK NUMBER	REMARKS	REVIEWED BY
8.	<p>EPNG has proposed the following exemptions:</p> <p><i>(1) <u>Lubricating oils</u> - EPNG stores oils in lubricating tanks at the Dutch Flat facility that are less than 10,000 gallons and have a vapor pressure less than the fuel oils exempted in R18-2-701.21. EPNG proposes that ADEQ exempt the oil storage tanks from R18-2-710, or list this requirement as inapplicable. ADEQ agrees that monitoring, reporting and recordkeeping requirements are not applicable to Dutch Flat's oil tanks and has listed this activity as insignificant.</i></p> <p><i>(2) <u>Sulfur and fuel bound nitrogen monitoring</u> - EPNG requests to be exempted from fuel bound nitrogen monitoring because a zero value was used for the calculation of nitrogen oxides in 60.332(a). EPNG also requests to be exempted from sulfur monitoring because their turbines burn only pipeline quality natural gas that contains less than 0.8% by weight sulfur, as required by its FERC Tariff.</i></p> <p>According to EPA Memorandum dated August 14, 1987 titled <u>Authority for Approval of Custom Fuel Monitoring Schedules Under NSPS Subpart GG</u>, fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine. However, sulfur monitoring is still required.</p> <p><i>(3) <u>Sample Ports</u> - EPNG did not install sample ports on the 2 Waukesha electrical generators because testing was not a requirement in the operating permit (#65039). EPNG requests that ADEQ exempt the requirement to have sample ports on the exhaust stacks for the 2 Waukesha electrical generators.</i></p> <p>ADEQ has not included any testing requirements for the 2 generators in the Title V permit.</p> <p><i>(4) <u>Opacity Limitation</u> - EPNG's operating permit requires the Dutch Flat compressor station to meet a 20% opacity standard. EPNG can find no regulatory basis for this 20% standard in NSPS.</i></p> <p>As required under A.A.C. R18-2-610, ADEQ has included in the Title V permit an opacity limitation of 40% for nonpoint sources. ADEQ agrees that there is no regulatory basis for the 20% standard contained in the current operating permit.</p>	SF1

REMARK NUMBER	REMARKS	RECVD BY
9.	<p>EPNG has proposed the following exemptions from Installation Permit Requirements (#65039)</p> <p><i>(1) Attachment B, Section II.B of the installation permit limits EPNG to 20% opacity from the 2 turbines and generators.</i>  There is no emission limitation for opacity contained in 40CFR60 Subpart GG, therefore, the turbines will have no opacity limitation in their Title V permit. We are hereby revising the installation permit through the Part 70 renewal process and removing the opacity requirement. However, the generators are subject to A.A.C. R18-2-719, hence, they will be limited to 40% opacity.</p> <p><i>(2) Attachment B, Section V of the installation permit requires EPNG to burn Sweet Natural Gas in the two turbines and electrical generators. The natural gas must not contain more than 0.25 grains of H<sub>2</sub>S per 100 scf.</i>  There is no basis to the above requirements. Pursuant to R18-2-306.A.2, EPNG will be limited to burn only pipeline quality natural gas in their Title V permit. In accordance with 40CFR60 60.333.(b), they may not burn fuel which contains sulfur in excess of 0.8% by weight. These limitations will be reflected in the Title V permit, in place of those listed above.</p> <p><i>(3) Attachment B, Section VI of the installation permit contains limitations on fuel gas consumption for the two turbines and one operational generator.</i>  Since these calculations are similar to the calculations in the Title V application at maximum capacity, the limitation based on firing rate is not included in the Title V permit. Additionally, these limits were not imposed to avoid an applicable requirement.</p> <p><i>(4) Attachment B, Section IX of the installation permit requires EPNG to operate only one electrical generator at a time.</i>  There is no regulatory basis for this rule and is not included in the Title V permit.</p>	SF1

## TECHNICAL REVIEW OF PERMIT NUMBER 1000169 (El Paso Natural Gas Company, Dutch Flat Compressor Station)

### General Comments

El Paso Natural Gas Company (EPNG) provides natural gas transportation services for natural gas suppliers and end users throughout the southwestern United States. EPNG owns and operates a large pipeline network for which the Dutch Flat Compressor Station serves as one of the gas compression locations. Compression is needed to maintain enough pressure in the pipeline to keep the gas flowing.

The Dutch Flat station operates two simple cycle gas turbines to drive the compression units. In addition, the Dutch Flat station has two auxiliary generators for power generation. However, one is considered an insignificant activity because it is used only for emergency or standby service. Both are powered by the combustion of natural gas. The gas turbine stacks are the primary sources of air pollutant emissions. The primary pollutant present in the stack gases resulting from combustion of natural gas is NO<sub>x</sub>. Formaldehyde, SO<sub>2</sub>, CO, and VOCs are other trace pollutants present in the stack gases. Other equipment on site is comprised mainly of valves, compressor seals, connections and associated piping, and emissions from these units are mainly trace amounts of VOCs.

### Regulatory History

The first air quality permit was issued to the Dutch Flat compressor station on 1/25/93. The permit number is 65039. The permit was later reopened and revised by the Air Pollution Control Hearing Board. The revision modified the stack height requirement and was issued as Permit Number 65039M1 on 12/1/95. The most relevant conditions of Permit #65039 are:

Emission Limits

1. Permittee must comply with the NO<sub>x</sub> emission equation of 40 CFR 60.332(a)(2).
2. Permittee shall have less than 20% opacity emissions from the Taurus, Centaur turbines, and the Waukesha auxiliary engine.
3. Visible emissions shall have opacity lesser than 40%.

### Performance Tests

4. Permittee shall conduct an initial performance test within 60 days after achieving maximum production rate but not later than 180 days after startup, for NO<sub>x</sub> and CO.
5. Permittee shall perform a performance test for NO<sub>x</sub> and CO annually.

### Fuel Amount

6. Permittee shall not use more than 54,257 scf/hr of natural gas in the Solar Taurus turbine.
7. Permittee shall not use more than 48,030 scf/hr of natural gas in the Centaur H turbine.
8. Permittee shall not use more than 4008 scf/hr of natural gas in the Waukesha auxiliary generator.
9. Permittee shall document all fuel use.

### Fuel Analysis

10. Fuel-bound nitrogen content of natural gas shall not exceed 0.015% by weight.

11. Permittee shall record the amount of fuel burned and sulfur and nitrogen content of fuel.
- Other
12. Permittee shall not use fuel oil, used oil, or hazardous waste.
  13. Only one auxiliary generator may be operating at any one time.

Initial performance tests were conducted on July 18 and 19, 1994. The turbines met the emission limits as follows:

	Allowable rate	Tested rate
UNIT 1A - Taurus		
NOx	- 20.91 lb/hr	14.92 lb/hr
NOx @15% O2	- 200 ppm	87.9 ppm
CO	- 6.86 lb/hr	0.17 lb/hr
UNIT 2A - Centaur		
NOx	- 18.4 lb/hr	10.24 lb/hr
NOx @15% O2	- 200 ppm	68.6 ppm
CO	- 2.2 lb/hr	0.14 lb/hr

The most recent performance tests were conducted on January 23 and 24, 1997. The turbines met the emission rates as follows:

UNIT 1A - Taurus		
NOx	20.91 lb/hr	13.23 lb/hr
CO	6.86 lb/hr	0.1 lb/hr
UNIT 2A - Centaur		
NOx	18.4 lb/hr	11.5 lb/hr
CO	2.2 lb/hr	0.3 lb/hr

Additional performance tests were conducted on February 21, 1996 and February 28, 1995, in which all tests passed.

There have been no recorded violations of any permit conditions.

### ***Emissions***

The Title V application provides the following potential emission rates:

NOx: 223.28 tpy  
CO: 46.50 tpy  
VOC: 11.61 tpy  
SO<sub>2</sub>: 0.19 tpy  
Formaldehyde: 3.83 tpy



These emission rates were based on emission factors (e.g. AP-42), theoretical stoichiometric considerations and 8760 hours of operation per year. They have also reported test data based on testing carried out in 1993. The measured hourly emission rates when multiplied with the actual hours of operation in 1993 give the following actual emissions for that year:

NOx: 0.53 tpy (test data, actual hours)  
CO: 0.006 tpy (test data, actual hours)  
VOC: 0.004 tpy (test data, factors, actual hours)  
SO<sub>2</sub>: 0.0009 tpy (emission factors, actual hours)  
Formaldehyde: 0.02 tpy (emission factors, actual hours)

The emissions inventory (EI) for the year 1995 submitted to the Arizona Department of Environmental Quality (ADEQ) reported the following emissions:

CO: 8.06 tpy  
NOx: 101.90 tpy  
SO<sub>2</sub>: 0.09 tpy  
VOC: 1.06 tpy

### ***Permit Contents : Attachment B***

The Solar Taurus gas turbine was manufactured in 1993 and the Solar Centaur H was manufactured in 1991. Both are subject to the provisions of New Source Performance Standards (NSPS). (A NSPS for gas turbines was promulgated on 9/10/1979 and is listed as Subpart GG of 40CFR60. This contains NOx and sulfur dioxide standards). The state rule that covers the Waukesha auxiliary generators is *R18-2-719: Standards of performance for existing stationary rotating machinery*. This state rule considers emissions of three pollutants (i) particulate matter, (ii) visible emissions, and (iii) sulfur dioxide. There is no reference to NOx or CO emissions.

### **Emission Limits/Standards**

#### **A. Simple Cycle Gas Turbines**

Because the Dutch Flat station is subject to the provisions of 40 CFR 60, Subpart A and GG (NSPS), the pollutants that are controlled are SO<sub>2</sub> and NOx. Other pollutants included in the emission limits table of the permit are CO, VOC, PM and HAPs.

SO<sub>2</sub>: The emission limit for SO<sub>2</sub> requires EPNG to burn only pipeline quality natural gas that has a sulfur content of less than 0.8%.

NOx: The maximum emission limit for NOx is:

$$\text{STD} = 0.0150 \frac{(14.4)}{Y} + F$$

where: Y= heat rate

F = NOx emission allowance

(Please see 60.332(a)(2) for a more complete explanation of Y and F)

in accordance with 60.332(c), due to the heat input of the turbines falling between 10 and 100 million Btu/hr (5000 hp = 12.7 MM Btu/hr and 4470 hp = 11.4 MM Btu/hr).

CO, VOC, PM, HAPs: There are no emissions limitations for these pollutants.

## **B. Auxiliary Generators**

PM: The maximum potential particulate emissions from the auxiliary generators is calculated by the process weight rate equation of R18-2-719.C.1. The permit also requires EPNG to combust only pipeline quality natural gas.

SO<sub>2</sub>: EPNG may combust only natural gas in the auxiliary generators. In addition, the sulfur content of the natural gas must be less than 0.8%.

Opacity: The visible emissions standard, R18-2-719.E, imposes a 40% opacity limitation.

## **C. Non-point sources**

The standards in Article 6 are applicable requirements for non-point sources. The following sources will be monitored:

1. Driveways, parking areas, vacant lots
2. Unused open areas
3. Open areas (Used, altered, repaired, etc.)
4. Construction of roadways
5. Material transportation
6. Material handling
7. Storage piles
8. Stacking and reclaiming machinery at storage piles

All of these areas must comply with the opacity limitation of 40%. The control measures for these sites include gravel for driveways and native vegetation for unused open areas. Most of the other sources require control measures of dust suppressants and/or wetting agents. Material transportation and storage piles also include covering the material, while stacking and reclaiming includes minimizing fall distance.

EPNG has indicated in the application, that rare instances of open burning may occur. The condition in the permit directs EPNG to obtain a permit from ADEQ, or the local officer in charge of issuing burn permits.

## **D. Other Periodic Activities**

### **Abrasive Blasting**

EPNG has indicated in the permit application that there might be a few occasions on which abrasive blasting activities are conducted on-site. R18-2-726 and R18-2-702.B are the applicable requirements. The Title V permit requires EPNG to either wet blast or use effective enclosures to reduce visible emissions to less than 40% opacity.

## Spray Painting

EPNG has indicated in the permit application that there might be a few occasions on which spray painting activities are conducted on-site. R18-2-727 and R18-2-702.B are the applicable requirements. Volatile Organic Compounds (VOC's) and Opacity are the regulated pollutants. R18-2-727.A and R18-2-727.B are included in the approved State Implementation Plan (SIP). R18-2-727.C and R18-2-727.D are also a part of the approved SIP. They are present in the definitions section of the SIP as R9-3-101.117. EPA approved SIP provision R9-3-527.C is not present in the amended rule. However, R9-3-527.C is an applicable requirement, and is federally enforceable until the current State SIP is approved by the EPA. The Title V permit requires EPNG to capture at least 96% of the overspray (except for architectural coating or spot painting). Also, EPNG shall not dispose by evaporation more than 1.5 gallons of photochemically reactive solvent in any one day.

## Mobile Sources

EPNG has indicated in the permit application that there might be a few occasions on which "mobile source" activities are conducted. The following sources will be monitored:

1. Off road machinery
2. Roadway and site cleaning machinery
3. Roadway and site cleaning

R18-2-801, R18-2-802, and R18-2-804 are the applicable requirements. These areas must comply with the opacity limitation of 40%. Control measures include dust suppressants and/or wetting agents.

## E. Fuel Limitation

EPNG's installation permit contains limitations on fuel gas consumption for the two turbines and one operational generator. After much research, there is no indication that the prior permit had fuel limits to avoid an applicable requirement. In addition, calculations show that the maximum horsepower corresponds to this fuel consumption. Therefore, limiting the source to their fuel consumption is unnecessary and overly burdensome. ADEQ is hereby revising the installation permit and removing the fuel limitation requirement from the Title V permit in this renewal process.

## **Monitoring and Recordkeeping Requirements**

### **A. Simple Cycle Gas Turbines**

SO<sub>2</sub>: "Pipeline-quality" natural gas has to conform to standards approved by the Federal Energy Regulatory Commission (FERC). One of the FERC standards limits the sulfur content in the gas to less than 5 grains/100 scf (which is equivalent to 0.017 weight percent of sulfur). Another standard specifies that the heating value be greater than or equal to 967 Btu per cubic foot. EPNG runs the gas turbines with fuel drawn from their pipeline, and therefore it was decided that maintaining a copy of the FERC approved Tariff agreement on-site would be an adequate means of complying with the monitoring requirements for the sulfur standards.

NOx: The requirement to monitor the fuel nitrogen content has been waived as per EPA Memorandum *Authority for Approval of Custom Fuel Monitoring Schedules Under NSPS Subpart GG*, August 14, 1987. This memo was made available to our Division by Steve Frey of EPA Region IX. One of the items in the memo states:

"Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine."

## **B. Auxiliary Generators**

PM: There is no monitoring or recordkeeping requirements for particulate matter emissions from the auxiliary generators.

SO<sub>2</sub>: In accordance with R18-2-719.I, the daily sulfur content and lower heating value of fuel must be recorded. However, "pipeline-quality" natural gas has to conform to standards approved by the Federal Energy Regulatory Commission (FERC). One of the FERC standards limits the sulfur content in the gas to less than 5 grains/100 scf (which is equivalent to 0.017 weight percent of sulfur). Another standard specifies that the heating value be greater than or equal to 967 Btu per cubic foot. EPNG runs the auxiliary generators with fuel drawn from their pipeline, and therefore it was decided that maintaining a copy of the FERC approved Tariff agreement on-site would be an adequate means of complying with the monitoring requirements for the sulfur standards.

## **C. Non-point Sources**

The specific non-point sources are listed in the above section. Monitoring and recordkeeping requirements for driveways (1) includes maintaining the gravel, and keeping a log of dates new gravel is added. Unused open areas (2) includes a monthly status of the areas and dates fresh vegetation was added. All other non-point sources (3-8) require a record of the date and type of activity performed, and the type of controls used. Also, monitoring requirements for the applicable open burning rule may be satisfied by keeping all open burn permits on file.

## **D. Other Periodic Activities**

### **Abrasive Blasting**

Monitoring and recordkeeping requirements for abrasive blasting consist of maintaining a log of the date and type of project, and the control measures used.

### **Spray Painting**

Monitoring and recordkeeping requirements for spray painting consist of maintaining a log of the date and duration of the project, control measures used, and the MSDS of paints used.

## Mobile sources

The specific mobile sources are listed in the above section. Monitoring and recordkeeping requirements for off road machinery (1) and cleaning machinery (2) consist of maintaining records of all vehicular maintenance. Roadway and site cleaning (3) requires maintaining a log of the date and duration of project, and the control measures used.

## **Reporting Requirements**

### **A. Simple Cycle Gas Turbines**

SO<sub>2</sub>: EPNG may comply with the recordkeeping requirement by monitoring the daily sulfur content or maintaining a copy of the FERC-approved Tariff agreement. Therefore, the reporting requirement is to notify the Department of any change in the Tariff agreement relating to sulfur content within 30 days.

NOx: As discussed above, the monitoring requirement for NOx was waived by the EPA.

CO, VOC, PM and HAPs: EPNG must report semi-annual reports of the dates and hours of operation of each turbine.

## **Testing Requirements**

### **A. Simple Cycle Gas Turbines**

EPNG's initial performance test in 1994 was conducted at only one load condition. According to 40 CFR 60.335, a Method 20 test shall be conducted at 30, 50, 75 and 100 percent of peak load or at four points in the normal operating range of the gas turbine. A schedule of compliance was added to the testing requirement section which was satisfactory to both EPA and EPNG. This schedule requires EPNG to perform an initial performance test within one year of permit issuance. Provisions for obtaining an alternative testing protocol are also included in this section.

Thereafter, EPNG is required to conduct an annual performance test for NOx on each turbine. Installation permit #65039 required EPNG to conduct a performance test for NOx and CO. Because of the low emissions for CO demonstrated above in the performance tests and emissions inventory, we are hereby removing the requirement to conduct an annual performance test for CO through this Part 70 renewal process.

### **B. Auxiliary Generators**

There is no testing requirements for the auxiliary generators.

## **List of Special Provisions**

In their application, EPNG provided a list of special provisions that they wanted to be addressed in the permit. This list is located in Tab 1 of the application. They have been addressed in the following manner:

Maintenance and Inspection (Item 1), Emergency Shut Down Systems (Item 3), Cathodic protection system (Item 4), General Maintenance & Construction Activities (Item 6), Start-up, Shutdown & Maintenance (Item 8), Insignificant Activities (Item 9)

It was decided that each of these items qualified for classification as an insignificant activity, and as such was included in the list in Attachment "E".

Hazardous Air Pollutants (Item 2): Refer to Sections VI and X, Attachment "A".

Abrasive Blasting (Item 5): Abrasive blasting activities have an applicable requirement in the Arizona Administrative Code A.A.C. Also, according to the definition in AAC R18-2-101.54, for an activity to be classified as insignificant, it should not have *any* applicable requirement. All projects have to comply with the general requirements of R18-2-726 and R18-2-702(B). Refer to Attachment B, I.C.1 and II.C.1.

Spray Painting (Item 7): A similar argument as in Item 5 above provides the reason for including R18-2-726 as an applicable requirement. Refer to I.C.2 and II.C.2.

Emissions Trading (Item 10): ADEQ has determined that EPNG should apply for a permit revision (if necessary) in case there are any changes in the permitted equipment.

Location of records (Item 11): Refer Section II.B, Attachment "B".

Portable Sources (Item 12): Any contractor operating portable sources on site will need to obtain an air permit (if required) to cover the portable source operation.

Air Conditioners (Item 13): Refer to Section XXI, Attachment "A".

Asbestos (Item 14): Refer to Attachment "C".

Performance Tests (Item 15): Refer to Section VI, Attachment "B".

